

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	
)	
Lifeline and Link Up)	WC Docket No. 11-42
Reform and Modernization)	
)	
Lifeline and Link Up)	WC Docket No. 03-109
)	
Federal-State Joint Board on)	
Universal Service)	CC Docket No. 96-45

**THE TELECOMMUNICATIONS REGULATORY BOARD OF PUERTO RICO'S
RESPONSE TO THE REQUEST FOR CLARIFICATION AND DECLARATORY
RELIEF FILED BY TRACFONE WIRELESS, INC.**

The Telecommunications Regulatory Board of Puerto Rico (“Board”), through undersigned counsel, responds to the April 10, 2012 “Request for Clarification and Declaratory Relief” filed by TracFone with the Federal Communications Commission (“Commission”).¹

TracFone’s filing is the latest salvo in its campaign to impede the Board’s efforts to eliminate waste and abuse in the Lifeline program in Puerto Rico. TracFone’s campaign has included unsuccessful litigation in the Puerto Rico courts, filings at the Commission, a noted lack of cooperation with the Board and an unfortunate pattern of misinformation.

Notwithstanding TracFone’s efforts, the Board has continued reducing from its Lifeline rolls those residents who are improperly receiving multiple benefits per person or family unit, while ensuring that the Lifeline recipients are not deprived of service. As the Board showed in

¹ *Lifeline and Link Up Reform and Modernization; Lifeline and Link Up; Federal-State Joint Board on Universal Service, Request for Clarification and Declaratory Relief, WC Docket No. 11-42 et al* (dated April 10, 2012).

prior comments,² while its enabling legislation required “permanent ineligibility”³ for those consumers found to be receiving an improper benefit, the Board initially reduced this period to one year, then to four months, and then, after finding that most of the affected residents were receiving multiple benefits because of the improper conduct by ETCs, eliminated the period altogether.⁴

The Board’s prior comments also showed that a Lifeline beneficiary could petition the Board and show why he/she should continue receiving benefits, and that the Board had established an expedited appeal process to review and decide these claims. The Board explained that hundreds of residents had already invoked this process.⁵

The Board also showed that the Commission’s Lifeline Order supported those jurisdictions that had moved forward with their own Lifeline audit mechanisms,⁶ and that nothing in the Commission’s Order required Puerto Rico to use the Interim Duplicate Resolution

² Comments of the Telecommunications Regulatory Board of Puerto Rico In Response to the Emergency Petition for Declaratory Ruling and Interim Relief Filed by TracFone Wireless, Inc., WC Docket Nos. 11-42, 03-109, CC Docket No. 96-45 (filed March 9, 2012); Reply Comments of the Telecommunications Regulatory Board of Puerto Rico In Response to the Emergency Petition for Declaratory Ruling and Interim Relief Filed by TracFone Wireless, Inc., WC Docket Nos. 11-42, 03-109, CC Docket No. 96-45 (filed March 19, 2012).

³ 27 L.P.R.A. § 269e(11)(3).

⁴ Exhibit A (Board March 7, 2012 Order).

⁵ Comments of the Telecommunications Regulatory Board of Puerto Rico In Response to the Emergency Petition for Declaratory Ruling and Interim Relief Filed by TracFone Wireless, Inc., WC Docket Nos. 11-42, 03-109, CC Docket No. 96-45 (filed March 9, 2012), at 8.

⁶ *Lifeline Reform and Modernization et al.*, WC Dkt. No. 11-42 *et al.*, Report and Order and Further Notice of Proposed Rulemaking, FCC 12-11 (Rel. Feb. 6, 2012), at ¶ 221.

Process (“IDRP”) process urged by TracFone.⁷ The Board thus showed that TracFone’s petition should be denied in its entirety.

TracFone’s latest filing argues that the Board has been inconsistent in its communications to customers, referencing a notice that has not yet been issued.⁸ Relying upon the *non-public* document,⁹ TracFone professes confusion in how consumers are to be treated and the ability of ETCs to communicate with their customers about the changes in the Lifeline program.

As explained below, there is nothing contradictory about how the Board has implemented the changes to the Lifeline program. Nor is there anything confusing about how the Board will communicate this information to consumers and ETCs, once the *non-public* document has been finalized, approved by the proper governmental authority and published.

The remainder of TracFone’s filing is little more than a rehash of its prior filings, urging the Commission to impose the IDRP process on the Board; complaining about Board rules and procedures; and questioning why the Board needs to take action to eliminate waste and fraud from the Lifeline Program in Puerto Rico. These complaints do not merit an extended response. The Board, not TracFone, is the tribune of the residents of Puerto Rico and has crafted a program to protect beneficiaries, while weeding out fraud, waste and abuse.

⁷ Comments of the Telecommunications Regulatory Board of Puerto Rico In Response to the Emergency Petition for Declaratory Ruling and Interim Relief Filed by TracFone Wireless, Inc., WC Docket Nos. 11-42, 03-109, CC Docket No. 96-45 (filed March 9, 2012), at 11-13.

⁸ *Lifeline and Link Up Reform and Modernization; Lifeline and Link Up; Federal-State Joint Board on Universal Service*, Request for Clarification and Declaratory Relief, WC Docket No. 11-42 *et al* (dated April 10, 2012), at 3-5.

⁹ *Id.* at Attachment A.

DISCUSSION

TracFone's alleged confusion stems from its review and speculation about a non-public document that TracFone "has obtained."¹⁰ Before the Board explains why TracFone's feigned confusion is without merit, and appears intended only to confuse and obfuscate the record, it wants to emphasize that none of this alleged confusion would have happened if TracFone had not improperly obtained this non-public document before its public dissemination.

In Puerto Rico, to avoid the appearance of a state agency or employee using official resources for political means in advance of an election, certain communications are required to be approved by Puerto Rico's State Electoral Commission.¹¹ Because the Board's communication about changes in the Lifeline program falls within this window, the Board was required to submit the March 26 notice to the Commonwealth Election Committee for review and approval. That process is ongoing, and the document is thus non-public. Neither the Board nor the Electoral Commission has published this document. TracFone's filing does not explain how it "obtained" this non-public draft of a document and why it believes it can disseminate and cite to it in a public filing. TracFone should be required to explain its conduct in this regard.

Turning to the March 26 Notice and TracFone's alleged confusion, a close review of the relevant facts shows that, contrary to TracFone's petition, there is nothing contradictory about the Board's program. To assist the Commission, below is a brief summary of the relevant dates and events:

¹⁰ *Lifeline and Link Up Reform and Modernization; Lifeline and Link Up; Federal-State Joint Board on Universal Service*, Request for Clarification and Declaratory Relief, WC Docket No. 11-42 *et al* (dated April 10, 2012), at n.6 ("TracFone has obtained a copy of the March 26 notice. . .").

¹¹ See Section 12.001 of Act Number 78 of June 1, 2011, providing that all announcements during an election year must be approved by Puerto Rico's State Electoral Commission.

- On January 30, 2012, the Board provided ETCs with the names of certain customers that needed to be removed from Lifeline rolls, *effective March 1, 2012*, based on duplicate social security numbers.
- On February 7, 2012, the Board provided ETCs with the names of certain customers that needed to be removed from Lifeline rolls, *effective April 1, 2012*, based on duplicate residential addresses.
- On February 17, 2012, at a meeting with ETCs, the Board decided to reduce the amount of time an ineligible subscriber was barred from receiving Lifeline benefits from 12 months to four months.
- On March 7, 2012, the Board issued an Order in which, based on information from customers showing that duplicates were largely the result of fraudulent conduct by ETCs, it amended its eligibility rules so that an ineligible subscriber could continue to receive Lifeline benefits.
- On March 14, the Board provided ETCs with the names of additional customers that needed to be removed from Lifeline rolls, *effective May 1, 2012*, based on duplicate social security numbers.

While the Board's March 7, 2012 Order allowed previously ineligible subscribers to receive Lifeline benefits, it provided different mechanisms based on the period in which they were found to be ineligible.

Because the first group of subscribers had been removed from the Lifeline rolls on March 1, 2012, the Board held that, for this group only:

beneficiaries who already lost their subsidy in March 2012 (customer base of December of 2011) may request it again. The Board will be the only entity authorized to announce said resolution to the consumers, by the means it deems appropriate.¹²

Thus, for those residents who had already lost their Lifeline benefits (on March 1, 2012), the Board determined to: (a) make them eligible to continue receiving benefits; (b) allow them to select the ETC of their choice; and (c) communicate with the Board about their selection.¹³

¹² Exhibit A (Board March 7, 2012 Order) at 2 (underlining in original).

¹³ *Id.*

For the remaining ineligible subscribers – who had not yet been removed from the Lifeline rolls – the Board’s March 7, 2012 Order also allowed them to “remain with the service to which the subsidy was first applied, if so desired.”¹⁴

Thus, in its March 7, 2012 Order, the Board resolved that all previously ineligible subscribers could continue receiving benefits. Those that had already been de-enrolled (on March 1, 2012), could decide which carrier to use going forward and communicate directly with the Board regarding that selection. Those that had not yet been de-enrolled (but were scheduled to be de-enrolled on April 1 and May 1, 2012), could also continue receiving benefits from the first carrier.

Against this backdrop, the Board prepared the March 26 Notice. When that Notice is finalized and published, it will go *only* to the first group of subscribers – those that had lost their benefit on March 1, 2012 and, pursuant to the Board’s March 7, 2012 Order, are entitled to obtain it again by communicating directly with the Board.

Indeed, the March 26 Notice makes clear that it is intended only for this universe of recipients, stating that, “[b]y the end of February 2012, telephone service companies announced to some of their customers that they would lose the Lifeline subsidy *by March 1st 2012*, because a duplicity of subsidy was identified, as per the information obtained by the Telecommunications Board directly from the telephone companies.”¹⁵ It explains that, for this universe of recipients, they can request a continuation of their benefits at the Board:

on March 7, 2012, the Telecommunications Regulatory Board of Puerto Rico issued a Resolution and Order, that leaves in suspense Rule 14.9(a) of the Provisional Amendment to the Universal

¹⁴ *Id.* at 2.

¹⁵ *Lifeline and Link Up Reform and Modernization; Lifeline and Link Up; Federal-State Joint Board on Universal Service*, Request for Clarification and Declaratory Relief, WC Docket No. 11-42 *et al* (dated April 10, 2012), Attachment A (emphasis added).

Service Resolution applicable to those persons identified as having more than one subsidy under their Social Security number. In consequence, those who received the communication informing them that their subsidy service would be suspended by March 1, 2012, can immediately request, with the company of their preference, only one subsidy for wireline or wireless service per person, as long as they comply with the criteria for eligibility.¹⁶

Because the Board has received significant information from subscribers preliminarily showing that some ETCs have engaged in alleged fraudulent and deceptive conduct, the Board's March 26 Notice appries recipients that, if they receive different information from an ETC (*e.g.*, that the customer must receive service from one particular carrier or that the customer is eligible to receive multiple benefits), they can contact the Board.¹⁷

TracFone's petition states that the March 26 Notice applies only to those persons de-enrolled on March 1, 2012. TracFone is correct. TracFone next asserts that, because the March 26 Notice does not apply to those persons who were scheduled to be de-enrolled on April 1 or May 1, they will lose their service. TracFone is incorrect.

As the Board's March 7 Order makes clear, "we deem it appropriate not to penalize consumers and, therefore, we resolved to leave pending our rule applicable to duplicates for social security of January 2012, in such a way that the customer can remain with the service to which the subsidy was first applied, if so desired." To be clear, for those consumers who were not de-enrolled on March 1, 2012, they can continue receiving their benefit and service from the first carrier. TracFone's suggestion to the contrary is completely false.

TracFone next questions "the legal status of the Board's March 26 notice to customers" and argues that it contradicts prior orders. As shown above, the "legal status" of the March 26 Notice is clear. It is a non-public document that TracFone has improperly obtained. TracFone's

¹⁶ *Id.*

¹⁷ *Id.*

remaining contentions are baseless. *Both* the March 7 Order and the March 26 Notice advise the March 1 de-enrollees that they may continue to receive service from the carrier of their choice, and both communications indicate that the Board will be the exclusive means of communication on this critical issue.

The remainder of TracFone's filing is a complete rehash of its prior submissions. TracFone complains that the Board is not doing enough to guard against duplicates in the future and that it should be required to utilize the IDRP mechanism. The Board has already shown that, as confirmed by the Lifeline Reform Order, states have freedom and flexibility to oversee the Lifeline program;¹⁸ states have the ability to take additional steps to regulate Lifeline;¹⁹ and that the Commission supports these efforts: "[a] number of states have or are about to move forward with their own systems for checking for duplicate Lifeline support. . . . We applaud the actions of these states and do not intend to inhibit the operation of these state efforts."²⁰ The Board will not repeat its previous arguments on this point and will instead rely on its prior submissions.

TracFone also complains that it should not be required to comply with Board rules requiring full last names and full social security numbers. This argument was fully addressed by the Board in its reply comments.²¹ TracFone has decided to participate in the Puerto Rico Telecommunications market and receives significant benefits from doing so. It needs to comply

¹⁸ *Lifeline Reform and Modernization et al.*, WC Dkt. No. 11-42 *et al.*, Report and Order and Further Notice of Proposed Rulemaking, FCC 12-11 (rel. Feb. 6, 2012), at ¶ 19 ("each state administers its own program, which has provided the states the freedom to experiment and develop new ways of making the program more effective and efficient").

¹⁹ *Id.* at ¶ 61.

²⁰ *Id.* at ¶ 221.

²¹ Reply Comments of the Telecommunications Regulatory Board of Puerto Rico In Response to the Emergency Petition for Declaratory Ruling and Interim Relief Filed by TracFone Wireless, Inc., WC Docket Nos. 11-42, 03-109, CC Docket No. 96-45 (filed March 19, 2012), at 8-9.

with the Board's rules. If TracFone believes that they are objectionable, then it can withdraw from the market. Its petition provides no basis for the Commission to get involved in this purely local issue.²²

CONCLUSION

For the foregoing reasons, the Commission should deny TracFone's petition for clarification and declaratory relief.

Respectfully submitted,

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April 17, 2012

***Counsel for The Telecommunications
Regulatory Board of Puerto Rico***

²² TracFone also asserts that it has always acted in compliance with applicable law. *Lifeline and Link Up Reform and Modernization; Lifeline and Link Up; Federal-State Joint Board on Universal Service*, Request for Clarification and Declaratory Relief, WC Docket No. 11-42 *et al* (dated April 10, 2012), at 5. As the Board has previously explained, it has received significant and credible information that some ETCs have been using deceptive and fraudulent conduct in Puerto Rico to benefit from the Lifeline program. *See* Comments of the Telecommunications Regulatory Board of Puerto Rico In Response to the Emergency Petition for Declaratory Ruling and Interim Relief Filed by TracFone Wireless, Inc., WC Docket Nos. 11-42, 03-109, CC Docket No. 96-45 (filed March 9, 2012), at n.5 ("The Board has taken multiple statements from recipients about improper and fraudulent sales practices by carriers and intends to refer these materials to the Commonwealth Department of Justice and the United States Department of Justice").

Exhibit A

**ASSOCIATED FREE STATE OF PUERTO RICO
TELECOMMUNICATION REGULATORY BOARD
OF PUERTO RICO**

**IN RE:
UNIVERSAL SERVICE FUND
LIFELINE/LINKUP**

CASE No.: JRT-2001-SU-0003

RESOLUTION AND ORDER

By means of this *Resolution and Order*, we receive the rule applicable to the individuals identified as duplicated for reasons of their social security of Regulation Number 8093, *Provisional Amendments to the Regulations on Universal Service*, in abeyance), as a result of the preliminary findings encountered by this Board.

Background:

As known by all eligible telecommunication companies (CTEs), this Board has issued various orders, related to the *Lifeline* program in Puerto Rico, in order for us to be able to comply with our ministerial function of overseeing the *Universal Service Fund*, by creating measures against loss, fraud and abuse of the , resources originating from it¹ The foregoing, after noticing a dizzying ascent starting in 2010 in the number of subscribers of said *Fund*, and after a detailed analysis of the reports submitted by the CTEs, that revealed a general pattern of lack of information and/or compliance with the criteria determined by the Board, over time. This resulted in an alarming number of duplicated and triplicated beneficiaries.²²

We issued *Resolutions and Orders*, on January 27, 2011, on July 13, 2011³ and January 24, 2012. To understand that the implementation of these norms and regulations was of an urgent nature, and sought the protection of public funds, the Board notified the emergency situation explained in detail above to the Governor of Puerto Rico, Honorable Luis G. Fortuno Burset, who certified the above on October 20, 2011, so that the *Provisional Amendments to Regulations on Universal Service* (Regulation 8093) had **immediate application**, under Sec. 2.13 of LPAU, 3 L.P.R.A. § 2133.

As a result of the foregoing, in particular our latest Order of January 24, 2012, CTE's: Puerto Rico Telephone Company, Inc. on its own behalf and DBA Claro, Tracfone on its own behalf and DBA Safelink, AT&T Mobility, Sprint, T-Mobile, Open Mobile asked for a meeting with the Board, which took place, on February 17, 2012, at our facilities. The Chairman of this Board, Sandra E. Torres and the Associate Member Gloria Escudero Morale were presents. After several hours of conversation, the parties arrived at various agreements, these among the most important:

¹ Through Law No. 213 of September 12, 1996, as amended, 27 L.P.R.A. § 265 *et seq.* (Law 213) the Puerto Rico Telecommunication Regulatory Board was created (Board) and it was expressly given the assignment, in regard to the universal service, of: 1) recognizing the telecommunication service as one whose performance pursues a purpose of high public interest, within a competitive market; 2) ensuring that a universal service it provided at a just, reasonable and affordable by all citizens, 3) dividing equitably among all telecommunication companies obligations, responsibilities and charges attributed to the development and preservation of universal service; 4) establishing specific support mechanisms , predictable and sufficient for preserving and developing universal service; 5) giving access to telecommunication services, reasonably comparable to those provided in urban areas to the consumers throughout the Island, including those with low income and who reside in rural areas or in areas in which access to such services is costly, verifying that said services are available in all of Puerto Rico, at just and reasonable process. 27 L.P.R.A. § 265.

² Upon a detailed observation of the information, we noticed that in some instances two or three services have been registered under the same address or the same number of social security. This irregularity in the performance and obtaining of the subsidy, was designated as duplicates and/or triplicates and, as a last resort, which shows that ineligible persons are benefiting , because of fraud and possible negligence on the part of the telecommunication companies, that provided eligibility to persons against the Law and applicable regulations.

³ Several CTEs appeared before the Court of Appeals to challenge the validity of both resolutions in cases KLRA 2011-0776; KLRA 2011-0780; KLRA 2011-0900; KLRA 2011- 0905; and KLRA 2011-0906. On December 16, 2011, the Honorable Court of Appeals issued a ruling in which it dismissed all appeals for administrative review, deeming them academic, in view of the Governor's emergency certification, and decreed that the Provisional Amendments to the Regulation on Universal Service (Regulation 8093) were applicable immediately under Sec. 2.13 of LPAU, 3 L.P.R.A. § 2133.

- all CTEs will send all cards to the duplicated beneficiaries for social security or family unit, as ordered by the Board since January of 2011 and
- the Board will change the rules provided in Regulation 8093 for duplication of social security, so that a person may not receive benefits from the *Lifeline* program for a period of four months.⁴

Discussion:

This Board has received thousands of calls and personal visits from consumers, since mailing the cards⁵ to the duplicated beneficiaries for social security or family unit, announcing the termination of their *Lifeline* benefits.

The forms they will fill out as part of the summary claims proceeding, began to illustrate patterns of conduct of the CTEs, that are certainly alarming, fraudulent and possibly criminal, which, as we mentioned in our *Resolution and Order* of January 27 of 2011, will be referred to the appropriate state and federal authorities. Moreover, they will be the subject of separate *Orders to Show Cause*, which will be served in due time, as the CTEs are exposed to the provisions of Section 13 c) of Regulation Number 7795, such as, but not limited to: (i) revocation of certification for rendering telecommunication services in Puerto Rico; (ii) revocation of the designation of eligibility; and (iii) imposition of daily fines and penalties of up to twenty-five thousand dollars per violation, in accordance with the provisions of Article II-7 of Law No. 213 of September 12, 1996, as amended, 27 L.P.R.A. § 267f (b) (1).

Likewise, we begin to detect that the majority of consumers have allegedly been misled and even deceived, even when they divulged that they had already the subsidy; except for those who have carried the service or are not customers of a CTE, that continues to report them to this Board.

Finally, as we deem it appropriate not to penalize consumers and, therefore, we resolved to leave pending our rule applicable to duplicates for social security of January 2012, in such a way that the customer can remain with the service to which the subsidy was first applied, if so desired. Therefore, in order for all consumers to be under the same conditions, this Board will allow the beneficiaries who already lost their subsidy in March of 2012 (customer base of December of 2011), may request it again. The Board will be the only entity authorized to announce said resolution to the consumers, by the means it deems appropriate.

Finally, this Board resolves that from now on, any CTE that has intracompany duplications will be exposed to an automatic fine of ten thousand (\$10,000) dollars per duplication, since the CTEs must obtain a control code designation, to be assigned on the basis of existing customer data.

In view of the foregoing, this Board RESOLVES and ORDERS:

IT IS RESOLVED TO LEAVE PENDING OUR RULE APPLICABLE TO DUPLICATES FOR SOCIAL SECURITY OF JANUARY OF 2012, IN SUCH A WAY THAT THE CUSTOMER CAN REMAIN WITH THE SERVICE TO WHICH THE SUBSIDY WAS FIRST APPLIED, IF SO DESIRED.

LIKewise, IT IS DETERMINED THAT THE BENEFICIARIES WHO ALREADY LOST THEIR SUBSIDY IN MARCH OF 2012 CAN

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TELECOMMUNICATION REGULATORY BOARD
OF PUERTO RICO
1996

⁴ The Regulations provide that the person may not receive the benefit for one year.

⁵ The language of both cards was written by this Board y and sent to the CTEs, in order for the same language to be used uniformly by all companies, so that this Board will ensure that customers receive information correctly and at the same conditions.

MAY REQUEST IT AGAIN, BUT THE BOARD WILL BE THE ONLY ENTITY AUTHORIZED TO ANNOUNCE SAID RESOLUTION TO THE CONSUMERS, BY THE MEANS IT DEEMS APPROPRIATE.

IT IS ESTABLISHED THAT FROM NOW ON, ANY CTE THAT HAS INTRACOMPANY DUPLICATES WILL BE EXPOSED TO AN AUTOMATIC FINE OF TEN THOUSAND (\$10,000) DOLLARS PER DUPLICATION.

IT IS ORDERED THAT THE CTES MUST OBTAIN A CONTROL CODE DESIGNATION, TO BE ASSIGNED ON THE BASIS OF EXISTING CUSTOMER DATA.

Stipulating that having exhausted the remedy of reconsideration before the Telecommunication Regulatory Board of Puerto Rico, and in compliance with the provisions of Section 4.2 of the Uniform Administrative Procedure Act (Law No. 170 of August 12, 1988, as amended), a party adversely affected by this Resolution and Order may submit a Request for Review before the Court of Appeals of Puerto Rico having jurisdiction, within a period of thirty (30) days, counted starting from the date the copy of service of the final Resolution and Order for reconsideration issued by the Board is entered on the record. The party will serve the submission of the request for review to the Board and to all parties within the period for requesting said review. Service may be carried out by mail. Stipulating that if the date of entering on the record a copy of service of the final order or resolution for the Board's reconsideration is entered on the record, is different from the date of mailing said service, the period of thirty (30) days for requesting judicial review will be calculated starting on the date of mailing.

SERVE this Resolution and Order to the eligible telecommunication companies: Puerto Rico Telephone Company, Inc, Ledo. Walter Arroyo, PO Box 360998, San Juan, PR 00936-0998; T-Mobile Puerto Rico LLC, Leda. Jeanne Habib, 654 Ave. Muñoz Rivera, Suite 2000, San Juan, PR 00918; SprintCom, Inc. h/n/c Sprint PCS, Ledo. Miguel J. Rodríguez Marxuach; PO Box 16636, San Juan, PR 00908-6636; AT&T Mobility Puerto Rico, Inc, Leda. Rebecca Guerríos, PO Box 192830, San Juan, PR 00919-2830; PR Wireless, Inc. h/n/c Open Mobile, Ledo. Javier Lamoso, PO Box 71569, San Juan, PR 00936-8669; WorldNet Telecommunications, Inc, Leda. Vanessa Santo Domingo Cruz, PO Box 3365, Guaynabo, PR 00970-3365; Sr. David Bogaty, Centro Internacional de Mercadeo, 90 Carretera 165, Suite 201, Guaynabo, PR 00968-8059; Tracfone Wireless, Inc, Ledo. Edwin Quiñones, PO Box 19417, San Juan, PR 00910; Telóte h/n/c Life Wireless, Ledo. Roberto L. Prats Palerm, American Airlines Building, 1509 López Landrón, 10 Floor, San Juan, PR 00911; Absolute Mobile, Inc, Sr. Christopher Peltier, PO Box 830010, Ocala, FL 34483-0010; TerraCom, Inc, Leda. Jessica Hernández Sierra, Goldman Antonetti & Córdova, PSC, PO Box 70364, San Juan, PR 00936-8364

Thus agreed upon by the Board, March 7, 2012.

CERTIFICATION

I HEREBY CERTIFY that this copy is the true and exact copy of the Resolution and Order approved by the Board, on March 7, 2012. I also CERTIFY that today, March 8, 2012, I delivered a copy of this Resolution and Order to the parties indicated in the order for service and proceeded with entering it on the record.

IN WITNESS WHEREOF I sign this document in San Juan, Puerto Rico, today, March 7, 2012

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TELECOMMUNICATION REGULATORY BOARD
OF PUERTO RICO
1996


Ciorah J. MONTES GILORMINI

Board Secretary



March 14, 2012

Certification

Park IP Translations

This is to certify that the attached translation is, to the best of my knowledge and belief, a true and accurate translation from Spanish into English of the Resolution and Order approved by the Associated Free State of Puerto Rico Telecommunication Regulatory Board of Puerto Rico, on March 7, 2012.

Abraham I. Holczer

Project Manager